

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

OCA-Greater Houston, *et al.*,

*Plaintiffs,*

v.

Jose Esparza, *et al.*,

*Defendants.*

No. 1:21-cv-00780-XR

Consolidated with *La Unión del Pueblo  
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE, AND NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE’S  
[PROPOSED] ANSWER TO SECOND AMENDED COMPLAINT**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote. The Republican Committees deny that SB 1 is “illegal” or “aims to make it harder for Texans to vote.” Voter turnout data and the statements of public officials speak for themselves and do not require a response. Paragraph 1 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican

Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 1 and so deny them.

2. Legislative history speaks for itself and does not require a response. Paragraph 2 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 2 and so deny them.

3. The Republican Committees deny that SB 1 “make[s] it more burdensome and potentially impossible for many Texas voters and community organizations to participate in the democratic process.” The Republican Committees deny the remaining allegations in Paragraph 3.

4. The Republican Committees deny that SB 1 “takes particular aim” at any voters or organizations. The statute speaks for itself and does not require a response. Paragraph 4 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

5. The statute speaks for itself and does not require a response. Paragraph 5 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

6. The Republican Committees deny that SB 1 “target[s]” any voters or community organizations. Court decisions speak for themselves and do not require a response. Paragraph 6 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees deny that Plaintiffs are entitled to relief.

## **JURISDICTION AND VENUE**

7. Paragraph 7 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

8. Paragraph 8 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 8.

## **PARTIES**

9. Paragraph 9 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 9 and so deny them.

10. Paragraph 10 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.

11. Paragraph 11 legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 11 and so deny them.

12. Paragraph 12 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 12 and so deny them.

13. Paragraph 13 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 13 and so deny them.

14. Footnote 1 to Paragraph 14 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees deny these allegations. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 14 and so deny them.

15. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15 and so deny them.

16. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 and so deny them.

17. The Republican Committees deny SB 1 harms anyone. Paragraph 17 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican

Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 17 and so deny them.

18. The Republican Committees deny SB 1 harms anyone. Paragraph 18 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 18 and so deny them.

19. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19 and so deny them.

20. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 and so deny them.

21. The Republican Committees deny SB 1 harms anyone. Paragraph 21 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 21 and so deny them.

22. The Republican Committees deny SB 1 harms anyone. Paragraph 22 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 22 and so deny them.

23. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 23 and so deny them.

24. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 24 and so deny them.

25. Paragraph 25 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 25 and so deny them.

26. Paragraph 26 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 26 and so deny them.

27. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 27 and so deny them.

28. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28 and so deny them.

29. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 and so deny them.

30. The Republican Committees deny SB 1 harms anyone. Paragraph 30 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 30 and so deny them.

31. The Republican Committees deny SB 1 harms anyone. Paragraph 31 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31 and so deny them.

32. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32 and so deny them.

33. The Republican Committees deny SB 1 harms anyone. Paragraph 33 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 33 and so deny them.

34. The Republican Committees deny SB 1 harms anyone. Paragraph 34 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 34 and so deny them.

35. The Republican Committees admit that Defendant Scott is the Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. The statutes speak for themselves and do not require a response. Paragraph 35 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

36. The statutes speak for themselves and do not require a response. Paragraph 36 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

37. The statutes speak for themselves and do not require a response. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

38. The statute speaks for itself and does not require a response. Paragraph 38 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

39. The statements of public officials and legislative history speak for themselves and do not require a response. Paragraph 39 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 39 and so deny them.

40. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity. The statutes and statements on an agency website speak for themselves and do not require a response. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

41. The statutes speak for themselves and do not require a response. Paragraph 41 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



42. The statutes and legislative history speak for themselves and do not require a response. Paragraph 42 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

43. The statutes and court decisions speak for themselves and do not require a response. Paragraph 43 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

44. Paragraph 44 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 44 and so deny them.

45. The statements of public officials and legislative history speak for themselves and do not require a response. Paragraph 45 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 45 and so deny them.

46. The statements of public officials speak for themselves and do not require a response. Paragraph 46 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 46 and so deny them.

47. The statements of public officials speak for themselves and do not require a response. Paragraph 47 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 47 and so deny them.

48. The Republican Committees admit that Defendant Ogg is the Harris County District Attorney and that Plaintiffs purport to sue her in her official capacity. The lawsuit speaks for itself and does not require a response. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

49. The Republican Committees admit that Defendant Garza is the Travis County District Attorney and that Plaintiffs purport to sue him in his official capacity. The lawsuit speaks for itself and does not require a response. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

50. The Republican Committees admit that Defendant Longoria is the Harris County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The lawsuit speaks for itself and does not require a response.

51. The Republican Committees admit that Defendant DeBeauvoir is the Harris County Clerk and that Plaintiffs purport to sue her in her official capacity. The lawsuit speaks for itself and does not require a response.

52. Statutes and regulations speak for themselves and do not require a response. Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

53. The statute and statements on a government website speak for themselves and do not require a response. Paragraph 53 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 53 and so deny them.

#### **FACTUAL BACKGROUND**

54. The Republican Committees deny that SB 1 makes it difficult for Texans to vote, that the Texas Legislature sought to “curtail Texans’ voting rights,” or that the Texas Legislature “did so in active defiance of well-established federal voting rights laws and principles.” Paragraph 54 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 54 and so deny them.

55. The Republican Committees deny that SB 1 will “illegally disenfranchise voters.” Paragraph 55 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 55 and so deny them.

56. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 56 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

57. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Litigation documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 57 and so deny them.

58. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions and litigation documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 58 and so deny them.

59. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated

by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 and so deny them.

60. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions and litigation documents speak for themselves and do not require a response. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 60 and so deny them.

61. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 and so deny them.

62. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions, litigation documents, and legislative history speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62 and so deny them.

63. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). Court decisions speak for themselves and do not require a response. Paragraph 63 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 63 and so deny them.

64. Court decisions speak for themselves and do not require a response. Paragraph 64 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 64 and so deny them.

65. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66 and so deny them.

67. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. Litigation documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68 and so deny them.

69. The Republican Committees deny that Texas has “restrictive” voting laws or that voting in Texas is “difficult.” Paragraph 69 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

70. The referenced sources speak for themselves and do not require a response. Paragraph 70 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 70 and so deny them.

71. 235. Statements made in in media articles speak for themselves and do not require a response. Paragraph 71 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and so deny them.

72. Statements made in in media articles speak for themselves and do not require a response. Paragraph 72 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72 and so deny them.

73. The referenced sources speak for themselves and do not require a response. Paragraph 73 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 73 and so deny them.

74. Court decisions speak for themselves and do not require a response. Paragraph 74 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 74 and so deny them.

75. The Republican Committees deny that that Texas “attempts to make voting as difficult as possible.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 75 and so deny them.

76. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 76 and so deny them.

77. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 77 and so deny them.



78. Court decisions, Census Bureau data, and statements made in media articles speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 78 and so deny them.

79. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 79 and so deny them.

80. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 80 and so deny them.

81. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 81 and so deny them.

82. Paragraph 82 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 82 and so deny them.

83. Legislative history speaks for itself and does not require a response. Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 83 and so deny them.

84. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 84 and so deny them.

85. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 and so deny them.

86. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.

87. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 87 and so deny them.

88. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 88 and so deny them.

89. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 89 and so deny them.

90. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 91 and so deny them.

92. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 and so deny them.

93. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93 and so deny them.

94. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 94 and so deny them.

95. The statute speaks for itself and does not require a response. Paragraph 95 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

96. The Republican Committees deny that SB 1 violates any federal law. The statute speaks for itself and does not require a response. Paragraph 96 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

97. The statutes speak for themselves and do not require a response. Paragraph 97 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

98. Texas law speaks for itself and does not require a response. Paragraph 98 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

99. The statute speaks for itself and does not require a response. Paragraph 99 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

100. The statute speaks for itself and does not require a response. Paragraph 100 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

101. The statute speaks for itself and does not require a response. Paragraph 101 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

102. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 102 and so deny them.

103. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103 and so deny them.

104. The statute speaks for itself and does not require a response. Paragraph 104 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

105. The statute speaks for itself and does not require a response. Paragraph 105 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

106. The statute speaks for itself and does not require a response. Paragraph 106 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

107. The statute speaks for itself and does not require a response. Paragraph 107 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

108. The statute speaks for itself and does not require a response. Paragraph 108 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

109. The statutes speak for themselves and do not require a response. Paragraph 109 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

110. The statute speaks for itself and does not require a response. Paragraph 110 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

111. The statute speaks for itself and does not require a response. Paragraph 111 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

112. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 112 and so deny them.

113. Paragraph 113 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 113 and so deny them.

114. Paragraph 114 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 114 and so deny them.

115. The statutes speak for themselves and do not require a response. Paragraph 115 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 115 and so deny them.

116. Paragraph 116 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 116 and so deny them.

117. Paragraph 117 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 117 and so deny them.

118. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 118 and so deny them.

119. Paragraph 119 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 119 and so deny them.

120. Paragraph 120 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 120 and so deny them.

121. Paragraph 121 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 121 and so deny them.

122. Paragraph 122 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 122 and so deny them.

123. Paragraph 123 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 123 and so deny them.

### **COUNT 1**

124. Section 101 of the Civil Rights Act speaks for itself and does not require a response.

125. The Republican Committees deny that any of the challenged provisions of SB 1 “violates” any provision of the Civil Rights Act. Paragraph 125 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

126. Paragraph 126 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

127. The Republican Committees deny that any of the challenged provisions of SB 1 is “preempted by federal law.” Paragraph 127 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

128. The Republican Committees deny that Plaintiffs are entitled to relief. Court decisions speak for themselves and do not require a response. Paragraph 128 and Footnote 12 state legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



## COUNT 2

129. Title II of the Americans with Disabilities Act (ADA) and its implementing regulations speak for themselves and do not require a response. Paragraph 129 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

130. Title II of the ADA and its implementing regulations speak for themselves and do not require a response. Paragraph 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

131. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 131 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

132. The Republican Committees deny that SB 1 interferes with any person's rights under Title II of the ADA. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 132 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

133. The Republican Committees deny that SB 1 prevents voters with disabilities from fully and equally enjoying access to voting. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 133 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

134. The Republican Committees deny that SB 1 subjects voters with disabilities to discrimination. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 134 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

135. The Republican Committees deny that any of the challenged provisions of SB 1 “discriminate[s]” against any voter. Paragraph 135 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

136. The Republican Committees deny the allegations in Paragraph 136.

137. The statute speaks for itself and does not require a response. Paragraph 137 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

138. The Republican Committees deny the allegations in Paragraph 138.

139. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 139 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

### **COUNT 3**

140. Section 504 of the Rehabilitation Act of 1973 speaks for itself and does not require a response.

141. Section 504 of the Rehabilitation Act of 1973 speaks for itself and does not require a response.

142. Section 504 of the Rehabilitation Act of 1973 and its implementing regulations speak for themselves and do not require a response.

143. The Republican Committees deny that SB 1 “subject[s]” any individual or voter “to discrimination.” Paragraph 143 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

144. The Republican Committees deny the allegations in Paragraph 144.

145. The Republican Committees deny the allegations in Paragraph 145.

146. The Republican Committees deny the allegations in Paragraph 146.

147. The Republican Committees deny that Plaintiffs are entitled to relief.

148. The Republican Committees deny the allegations in Paragraph 148.

149. The statute speaks for itself and does not require a response.

150. The statute speaks for itself and does not require a response. Paragraph 150 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

151. The statute speaks for itself and does not require a response. Paragraph 151 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

152. The Republican Committees deny that the new oath provisions are unlawful. Texas law speaks for itself and does not require a response. Paragraph 152 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are

without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 152 and so deny them.

153. The statute and regulations speak for themselves and do not require a response. Paragraph 153 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

154. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

155. Paragraph 155 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 155 and so deny them.

156. Paragraph 156 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 156 and so deny them.

157. Paragraph 157 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 157 and so deny them.

158. Paragraph 158 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 158 and so deny them.

159. Court decisions speak for themselves and do not require a response. Paragraph 159 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 159 and so deny them.

160. Paragraph 160 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 160 and so deny them.

161. Paragraph 161 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 161 and so deny them.

162. The statute speaks for itself and does not require a response. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

163. The statute speaks for itself and does not require a response. Paragraph 163 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

164. The statutes speak for themselves and do not require a response. Paragraph 164 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them.

165. The Republican Committees deny the allegations in Paragraph 165.

166. Court decisions speak for themselves and do not require a response. Paragraph 166 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166 and so deny them.

167. Paragraph 167 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 167 and so deny them.

168. Paragraph 168 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 168 and so deny them.

169. Paragraph 169 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 169 and so deny them.

170. Paragraph 170 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 170 and so deny them.

171. Paragraph 171 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 171 and so deny them.

172. Paragraph 172 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 172 and so deny them.

173. Paragraph 173 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 173 and so deny them.

174. Paragraph 174 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 174 and so deny them.

175. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 175 and so deny them.

#### **COUNT 4**

176. Section 208 of the Voting Rights Act speaks for itself and does not require a response.

177. Section 208 of the Voting Rights Act speaks for itself and does not require a response. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



178. The Republican Committees deny that SB 1 violates Section 208. SB 1 and court decisions speak for themselves and do not require a response. Paragraph 178 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

179. Statutes and court decisions speak for themselves and do not require a response. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

180. Court decisions speak for themselves and do not require a response. Paragraph 180 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

181. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 181 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## **COUNT 5**

182. The Republican Committees incorporate their responses to the allegations referenced in Paragraph 182.

183. The Republican Committees deny the allegations in Paragraph 183.

184. The Republican Committees deny that SB 1 interferes with, intimidates, or threatens voters' rights or subjects any voter to discrimination. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 184 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

185. Paragraph 185 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

186. The Republican Committees deny the allegations in Paragraph 186.

187. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 187 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

### **COUNT 6**

188. The Republican Committees incorporate their responses to the allegations referenced in Paragraph 188.

189. The Republican Committees deny the allegations in Paragraph 189.

190. The Republican Committees deny the allegations in Paragraph 190.

191. Paragraph 191 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

192. The Republican Committees deny the allegations in Paragraph 192.

193. The Republican Committees deny the allegations in Paragraph 193.

194. The Republican Committees deny that Plaintiffs are entitled to relief.

195. The statute speaks for itself and does not require a response. Paragraph 195 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

196. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 196 states legal conclusions and/or statements

of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

197. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 197 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

198. The statute speaks for itself and does not require a response. Paragraph 198 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

199. The statute speaks for itself and does not require a response. Paragraph 199 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

200. The statute speaks for itself and does not require a response. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

201. The statute speaks for itself and does not require a response. Paragraph 201 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

202. The statute speaks for itself and does not require a response. Paragraph 202 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

203. Texas law speaks for itself and does not require a response. Paragraph 203 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

204. The statute speaks for itself and does not require a response. Paragraph 204 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

205. Texas law speaks for itself and does not require a response. Paragraph 205 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

206. The statute speaks for itself and does not require a response. Paragraph 206 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

207. The statute speaks for itself and does not require a response. Paragraph 207 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

208. Paragraph 208 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 208 and so deny them.

209. Paragraph 209 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 209 and so deny them.

210. Paragraph 210 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 210 and so deny them.

211. Paragraph 211 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 211 and so deny them.

212. Paragraph 212 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 212 and so deny them.

213. Paragraph 213 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 213 and so deny them.

## COUNT 7

214. The First Amendment and court decisions speak for themselves and do not require a response. Paragraph 214 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

215. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

216. The Republican Committees deny the allegations in Paragraph 216.

217. Paragraph 217 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 217 and so deny them.

218. The Republican Committees deny that the challenged provision of SB 1 is “unconstitutionally overbroad.” Paragraph 218 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

219. Paragraph 219 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

220. Court decisions speak for themselves and do not require a response. Paragraph 220 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

221. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 221 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

222. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 222 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

223. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 223 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 223 and so deny them.

224. The Republican Committees deny the allegations in Paragraph 224.

225. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 225 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## **COUNT 8**

226. The Constitution and court decisions speak for themselves and do not require a response. Paragraph 226 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

227. Paragraph 227 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

228. The Republican Committees deny the allegations in Paragraph 228.

229. Paragraph 229 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

230. Paragraph 230 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

231. Paragraph 231 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

232. Paragraph 232 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

233. Paragraph 233 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

234. Paragraph 234 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



235. Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

236. Paragraph 236 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

237. Paragraph 237 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

238. The Republican Committees deny the allegations in Paragraph 238.

239. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 239 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

#### **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

##### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

##### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the applicable statutes of limitations.

### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

### **CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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\**Pro hac vice* applications forthcoming

\*\*Application for admission to the Western

District of Texas pending

Admitted in Pennsylvania

Not admitted in D.C. (directly supervised by  
John M. Gore, a licensed D.C. Bar member)